

UNITED STATES DISTRICT COURT

for the

Central District of California

UNICOLORS, INC., a California  
corporation,

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*Plaintiff(s)*  
V.

) ) )

Civil Action No.

LAVISH BOUTIQUE LLC, a Louisiana limited liability company; [ con't see p. 3]

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)  
)

*Defendant(s)*

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## **SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)* LAVISH BOUTIQUE LLC, a Louisiana limited liability company; THE RUSTIC LEOPARD, a Texas company; 7 ISLANDS FASHION, INC., a New York corporation; DESAREE MARIE CORPORATION, a Virginia corporation d/b/a "DASH OF SPARKLE BOUTIQUE"; JINNAH GROUP, LLC, a Texas limited liability company d/b/a "SUNSHINE & RODEOS"; DELLA DIRECT LLC, a Utah limited liability company d/b/a "She & Sho Clothing Co."; HAMPTON POINT BOUTIQUE LLC, a Georgia limited liability company; CLOTHO J&J USA, a California corporation d/b/a "COLLECTION BY CEZELE"; STREAMLINE REMARKETING, INC., a California corporation d/b/a "MAYA ANTONIA"; MONROE & MAIN, INC., a Wisconsin corporation; SILKROLL, INC., a Delaware corporation; ROSE SWIMSUITS, a business entity of form unknown; and DOES 1 through 10,

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: Trevor W. Barrett

Trevor W. Barrett  
Frank R. Trechsel  
DONIGER/BURROUGHS  
603 Rose Avenue  
Venice California 90291  
Telephone: (310) 590-1820

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

*CLERK OF COURT*

Date:

*Signature of Clerk or Deputy Clerk*

Civil Action No. \_\_\_\_\_

**PROOF OF SERVICE**

***(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))***

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
on *(date)* \_\_\_\_\_; or

I returned the summons unexecuted because \_\_\_\_\_; or

Other *(specify)*: \_\_\_\_\_

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

1 Trevor W. Barrett (SBN 287174)  
2 tbarrett@donigerlawfirm.com  
3 Frank Trechsel (SBN 312199)  
4 ftrechsel@donigerlawfirm.com  
5 DONIGER/BURROUGHS  
6 603 Rose Avenue  
7 Venice California 90291  
8 Telephone: (310) 590-1820

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10 Attorneys for Plaintiff

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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

UNICOLORS, INC., a California  
corporation,

Plaintiff,

v.

LAVISH BOUTIQUE LLC, a Louisiana  
limited liability company; THE RUSTIC  
LEOPARD, a Texas company; 7 ISLANDS  
FASHION, INC., a New York corporation;  
DESAREE MARIE CORPORATION, a  
Virginia corporation d/b/a “DASH OF  
SPARKLE BOUTIQUE”; JINNAH GROUP,  
LLC, a Texas limited liability company d/b/a  
“SUNSHINE & RODEOS”; DELLA  
DIRECT LLC, a Utah limited liability  
company d/b/a “She & Sho Clothing Co.”;  
HAMPTON POINT BOUTIQUE LLC, a  
Georgia limited liability company; CLOTHO  
J&J USA, a California corporation d/b/a  
“COLLECTION BY CEZELE”;  
STREAMLINE REMARKETING, INC., a  
California corporation d/b/a “MAYA  
ANTONIA”; MONROE & MAIN, INC., a  
Wisconsin corporation; SILKROLL, INC., a  
Delaware corporation; ROSE SWIMSUITS,

Case No.:

PLAINTIFF’S COMPLAINT FOR:

1. COPYRIGHT  
INFRINGEMENT
2. VICARIOUS AND/OR  
CONTRIBUTORY  
COPYRIGHT  
INFRINGEMENT

**Jury Trial Demanded**

1 a business entity of form unknown; and  
2 DOES 1 through 10,

3 Defendants.

5  
6 Plaintiff, UNICOLORS, INC. (“Unicolors” or “Plaintiff”), by and through its  
7 undersigned attorneys, complains and alleges against Defendants as follows:

8 **NATURE OF ACTION**

9 1. Plaintiff seeks injunctive relief and damages stemming from Defendants’,  
10 Lavish Boutique LLC (“Lavish Boutique”), The Rustic Leopard (“Rustic Leopard”), 7  
11 Islands Fashion, Inc. (“7 Islands”), Desaree Marie Corporation (“Dash of Sparkle”),  
12 Jinnah Group, LLC (“Sunshine & Rodeos”), Della Direct LLC (“She & Sho”),  
13 Hampton Point Boutique LLC (“Hampton Point”), Clotho J&J USA (“Cezele”),  
14 Streamline Remarketing, Inc. (“Maya Antonia”), Monroe & Main, Inc. (“Monroe”),  
15 SilkRoll, Inc. (“SilkRoll”), Rose Swimsuits (“Rose”), and DOES 1-10 (collectively  
16 “Defendants”), acts of copyright infringement in violation of the laws of the United  
17 States of America.

18 **JURISDICTION AND VENUE**

19 2. This action arises under the Copyright Act of 1976, Title 17 U.S.C., §  
20 101 *et seq.*

21 3. This Court has federal question jurisdiction under 28 U.S.C. § 1331 and  
22 1338 (a) and (b).

23 4. The Court has personal jurisdiction over Defendants and each of them  
24 because Defendants have purposefully directed their unlawful conduct to this  
25 judicial district and have conducted substantial business in this judicial district.

26 5. Venue is proper under 28 U.S.C. § 1391(c) and 1400(a) in that this is  
27 the judicial district in which a substantial part of the acts and omissions giving rise